

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

ARMIYA BANI LAGASAN,

Plaintiff,

v.

HADBAN AL-GHASEL

and

JIMLA AL-GHASEL also known as ZAMIA
MOHD also known as ZAMLA MOHD,

Defendants.

Civil Action No. 1:14-cv-01035-AJT-TCB

**AMENDED DECLARATION OF ANNA M. MCKENZIE
IN SUPPORT OF MOTION FOR DEFAULT JUDGMENT**

I, Anna M. McKenzie, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney licensed to practice law in the District of Columbia and admitted to appear *pro hac vice* before this Court. I am an associate at the law firm of Gibson, Dunn & Crutcher LLP (“Gibson Dunn”), counsel of record for Plaintiff Armiya Bani Lagasan (“Plaintiff” or “Ms. Lagasan”), and I am one of the attorneys responsible for representing Ms. Lagasan in the above-captioned matter.

2. Unless otherwise stated, I have personal knowledge of the following facts and, if called and sworn as a witness, I could and would competently testify thereto.

3. In support of Plaintiff’s Motion for Default Judgment, I submitted a declaration dated December 15, 2014. *See* Mem. in Supp. of Mot. for Default Judgment, Ex. C, Dkt. 14. (Dec. 17, 2014) (“December 15, 2014 Declaration”).

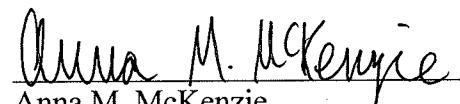
4. In my December 15, 2014 Declaration, I stated as follows: “Attached hereto as

Exhibit 1 is a true and correct copy of the Foreign Labor Certification Data Center Online Wage Library's prevailing wages for 'Maids and Housekeeping Cleaners' in Pittsburgh, Pennsylvania from July 2010 to June 2011." Mem. in Supp. of Mot. for Default Judgment, Ex. C, Dkt. 14 ¶ 3. (Dec. 17, 2014).

5. However, I erroneously attached as **Exhibit 1** to my December 15, 2014 Declaration a true and correct copy of the relevant wage data for the East Central Pennsylvania nonmetropolitan area, rather than for Pittsburgh, Pennsylvania.

6. I therefore submit this Amended Declaration along with a revised **Exhibit 1**, which consists of a true and correct copy of the Foreign Labor Certification Data Center Online Wage Library's prevailing wage data for "Maids and Housekeeping Cleaners" in **Pittsburgh, Pennsylvania** from July 2010 to June 2011, as referenced in my original December 15, 2014 Declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of January, 2015, in Washington, D.C.



Anna M. McKenzie
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel: 202.955.8500

EXHIBIT 1

Foreign Labor Certification Data Center

Online Wage Library

www.flcdatacenter.com



Wage Library

[Quick Search](#)
[Search Wizard](#)

Case Disclosure Data Archive

[H1B Data](#)
[H2A Data](#)
[H2B Data](#)
[Perm Data](#)

Also available:

[File Archive](#)

Skill Level Explanation

SVP Explanation

FLC Wage Data updated July 1, 2014

Job Zones updated July 1, 2014

[See change history](#)

Technical Support & Help FAQ page.

FLC Wage Results [New](#) [Quick Search](#) [New Search Wizard](#)

You selected the All Industries database for 7/2010 - 6/2011.

Your search returned the following: [Print Format](#)

Area Code: 38300
Area Title: Pittsburgh, PA MSA
OES/SOC Code: 37-2012
OES/SOC Title: Maids and Housekeeping Cleaners
GeoLevel: 1
Level 1 Wage: \$8.22 hour - \$17,098 year
Level 2 Wage: \$8.99 hour - \$18,699 year
Level 3 Wage: \$9.76 hour - \$20,301 year
Level 4 Wage: \$10.53 hour - \$21,902 year
Mean Wage (H-2B): \$9.76 hour - \$20,301 year

This wage applies to the following O*Net occupations:

37-2012.00 Maids and Housekeeping Cleaners

Perform any combination of light cleaning duties to maintain private households or commercial establishments, such as hotels, restaurants, and hospitals, in a clean and orderly manner. Duties include making beds, replenishing linens, cleaning rooms and halls, and vacuuming.

O*Net™ JobZone: 1

Education & Training Code: No Level Set

For information on determining the proper occupation and wage level see the new Prevailing Wage Guidance on the [Skill Level page](#).

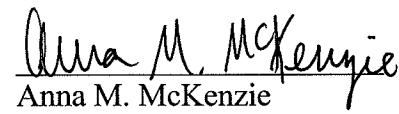
The prevailing wage must be at, or above the federal or state or local minimum wage, whichever is higher. The federal minimum wage is \$7.25/hr effective July 24, 2009.

The Foreign Labor Certification Data Center is developed and maintained by the [State of Utah](#) under contract with the [US Department of Labor, Office of Foreign Labor Certification](#).

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January, 2015, I deposited in the U.S. mail a true and correct copy of the above in a sealed envelope, with first class postage prepaid, to the addressees shown below:

Hadban and Jimla Al-Ghasel
100 South Reynolds Street
Unit # 603
Alexandria, VA 22304


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